

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

C.D.S. Inc.,

plaintiff,

- against -

Bradley Zetler; CDS, LLC; Rapid Systems CC; *and*
John Does 1-5,

defendants,

- and -

Amazon Web Services, Inc.; *and* Rackspace US,
Inc.,

nominal defendants.

Rapid Systems CC, CDS LLC *and* Bradley Zetler,

counterclaim plaintiffs,

- against -

C.D.S. Inc.; Diane Treat; Jerome Viollon; Christelle
Riot; Christophe Racle; Jerome Marechaux; *and*
CDS SARL,

counterclaim defendants.

16 Civ. 3199 (VM) (JLC)

ECF CASE

NOTICE OF MOTION FOR RECONSIDERATION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated February 1, 2017, the Declaration of Ihsan Dogramaci in Support of Motion for Reconsideration dated February 1, 2017, and the exhibits thereto, and upon all prior pleadings and proceedings in this case, defendants/counterclaim plaintiffs Rapid Systems CC, CDS LLC and Bradley Zetler (collectively “Rapid Systems”) will move this Court before the Honorable James L. Cott, United States Magistrate Judge, in Courtroom 21-D, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New

York, on a date and at a time designated by the Court, for an order pursuant to Local Civil Rule 6.3 granting reconsideration of the Court's Order entered January 20, 2017, (ECF No. 189) insofar as that Order denied Rapid Systems' request to modify the language of the Stipulated Protective Order in this case, and for such further relief as the Court deems just and proper.

Dated: New York, New York
February 1, 2017

Respectfully submitted,

/s/ Ihsan Dogramaci

Ihsan Dogramaci

e-mail: idogramaci@idlawoffice.net

THE LAW OFFICE OF IHSAN DOGRAMACI

1120 Avenue of the Americas, 4th Floor

New York, NY 10036

tel: (212) 309-7580

fax: (646) 568-3727

*Counsel for Rapid Systems CC, CDS LLC, and
Bradley Zetler*